

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION,
OPIATE LITIGATION**

MDL NO. 2804

Case No. 17-MD-2804

THIS DOCUMENT RELATES TO:

Judge Dan Aaron Polster

Salmons v. Purdue Pharma L.P., et al.

MDL Case #1:18-OP-45268;

Flanagan v. Purdue Pharma L.P., et al.

MDL Case #1:18-OP-45405

Doyle v. Purdue Pharma L.P., et al.

MDL Case No. #1:18-op-46327

Artz v. Purdue Pharma, L.P., et al.

MDL Case No. #1:19-op-45459

CONSENT MOTION TO EXCEED PAGE LIMITATIONS

Pursuant to Local Rule 7.1, NAS Opioid Plaintiffs (“Plaintiffs”) respectfully move this Court for leave to file a memorandum in support of Plaintiffs’ motion for class certification in excess of 40 pages. Plaintiffs request leave to file a supporting memorandum of no more than 70 pages.

Plaintiffs are requesting leave because the motion for class certification addresses claims contained in two separate complaints, and seeks certification of 4 separate classes. Plaintiffs’ counsel has reached out to Special Master David Cohen who has recommended filing this motion and reaching out to Defendants’ counsel for consent. Defendants’ counsel provided their consent on January 6, 2020 by email. Plaintiffs will consent to allowing Defendants to exceed the page limitations on their response.

Plaintiffs respectfully request that this Court allow Plaintiffs to file a memorandum in support of Plaintiffs' motion for class certification in excess of 40 pages, but no more than 70 pages.

DATED: January 6, 2020

Respectfully submitted,

/s/ Marc E. Dann

DANN LAW

Marc E. Dann (0039425)

P.O. Box 6031040

Cleveland, OH 44103

Telephone: 216-373-0539

Facsimile: 216-373-0536

notices@dannlaw.com

Counsel for NAS Plaintiffs

/s/ Celeste Brustowicz

COOPER LAW FIRM, LLC

Celeste Brustowicz (*Pro Hac Vice*)

Barry J. Cooper, Jr. (*Pro Hac Vice*)

Stephen H. Wussow (*Pro Hac Vice*)

Victor Cobb (*Pro Hac Vice*)

1525 Religious St.

New Orleans, LA 70130

Telephone: 504-399-0009

cbrustowicz@sch-llc.com

Counsel for NAS Plaintiffs

/s/ Kent Harrison Robbins

THE LAW OFFICES OF

KENT HARRISON ROBBINS, P.A.

Kent Harrison Robbins (*Pro Hac Vice*)

242 N.E. 27th St.

Miami, FL 33137

Telephone: 305-532-0500

Facsimile: 305-531-0150

khrlawoffices.com

Counsel for NAS Plaintiffs

/s/ Scott R. Bickford

MARTZELL, BICKFORD & CENTOLA

Scott R. Bickford (La. 1165)

Spencer R. Doody (La. 27795)

338 Lafayette St.

New Orleans, LA 70130

Telephone: 504-581-9065

srb@mbfirm.com

Counsel for NAS Plaintiffs

/s/ Kevin W. Thompson

THOMPSON BARNEY LAW FIRM

Kevin W. Thompson (*Pro Hac Vice*)

David R. Barney, Jr. (*Pro Hac Vice*)

2030 Kanawha Blvd.

East Charleston, WV 25311

Telephone: 304-343-4401

Facsimile: 304-343-4405

kwthompsonwv@gmail.com

Counsel for NAS Plaintiffs

/s/ Donald Creadore

THE CREADORE LAW FIRM, P.C.

Donald Creadore (NY Reg. No. 2090702)

450 7th Ave. – 1408

New York, NY 10123

Telephone: 212-355-7200

Facsimile: 212-583-0412

donald@creadorelawfirm.com

Counsel for NAS Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically on January 6, 2020 with the Clerk of Court and served upon all parties via CM/ECF at the party's registered email address.

/s/ Marc E. Dann
Marc E. Dann (0039425)
Counsel for NAS Plaintiffs